

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHEYANNE M. BANKS,
ISAIAH C. LUCAS,

Defendants.

) INDICTMENT

)
) **5 : 22 CR**

653

) CASE NO. _____

) Title 18, United States Code,
) Sections 922(a)(6), 924(a)(2) and
) (2)

JUDGE FLEMING

COUNT 1

(False Statements During Purchase of a Firearm, 18 U.S.C. §§ 922(a)(6), 924(a)(2) and (2))

The Grand Jury charges:

1. On or about February 7, 2022, in the Northern District of Ohio, Eastern Division Defendants CHEYANNE M. BANKS, aided and abetted by ISAIAH C. LUCAS, in connection with the acquisition of a firearm, to wit: an SCCY, Model CPX-2, 9mm pistol, bearing serial number C292119 from Cash America Pawn, located in Canton, Ohio, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false written statement to Cash America Pawn, which statement was intended and likely to deceive Cash America Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, United States Code, in that CHEYANNE M. BANKS represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, that she was the actual buyer of the firearm listed on the form and not buying it on behalf of another person, in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2) and (2).

FORFEITURE

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the allegation of Count 1 is incorporated herein by reference. As a result of the foregoing offense, Defendants CHEYANNE M. BANKS and ISAIAH C. LUCAS, shall forfeit to the United States any and all firearms and ammunition involved in or used in the commission violation charged in Count 1.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.